

## EPA Official Record

**Mail ID:** 889ACAAA0F02F6498DA0249E4A8F8AFB079A86E0

**From:** jfrantz@rangeresources.com

**To:** Butler, Barbara

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**Delivered Date:** 07/16/2013 08:29 AM EDT

**Subject:** RE: Ranking for Criteria

Hello everyone,

I wanted to see if you would consider changing your first criteria from mandatory to high. Based on the wide extent of the Marcellus drilling to date, It is unlikely you will find a HUC 12 watershed that does not contain at least one Marcellus horizontal well. If an operator does find a vacant watershed, it would probably represent a far step out that would be difficult to justify drilling and leaving stranded for a long time. In addition, there has been over 100 years of drilling tens of thousands of shallow oil and gas wells across PA.

I'm just trying to help you put together realistic guidelines and wanted to pass along my observations.

Your thoughts?

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**From:** Butler, Barbara [mailto:Butler.Barbara@epa.gov]

**Sent:** Wednesday, July 10, 2013 3:36 PM

**To:** Joe Frantz

**Cc:** Ford, Robert; Daniel Soeder; Alexandra Hakala; George Darakos; Richard Hammack; Scott Roy

**Subject:** Ranking for Criteria

Hi Joe,

Please find attached the research criteria file with our levels of importance and justifications for each. They are ranked within each of the prior categories.

Please let us know if you have any questions.

Thanks,  
Barb

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